

UNITED STATES DISTRICT COURT
EASTERN DISTRICT

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DEBORAH LITRAS,

Plaintiff,

-Against -

AMENDED
COMPLAINT
CV-11 5695

PVM INTERNATIONAL CORPORATION f/k/a
PVM INTERNATIONAL II LLC,
ETERNAL LOVE PARFUMS CORP. f/k/a
ETERNAL LOVE PARFUMS II LLC,
MAHENDER MURLIDHAR SABHNANI a/k/a
MAHENDER MURLIDHA SABHNANI,
VARSHA MAHENDER SABHNANI a/k/a VARSHA
MURLIDHA SABHNANI, "JOHN DOE AND JANE DOE"

Defendants.

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PRELIMINARY STATEMENT

1. On or about March 2000, DEBORAH LITRAS was hired as an employee of PVM INTERNATIONAL CORPORATION.
2. PVM INTERNATIONAL CORPORATION was a manufacturer, producer and seller of perfumes and did export perfumes to various areas of the world.
3. Upon information and belief, the income of the business far exceeded FIVE HUNDRED THOUSAND DOLLARS per year.

4. That on or about 2007 until the present time, PVM INTERNATIONAL CORPORATION did business at a location within the residential home of DEFENDANT MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI, AND VARSHA MAHENDER SABHNANI A/K/A VARSHNA MURLIDHAR SABHNANI.

5. That Plaintiff was the employee of PVM INTERNATIONAL CORPORATION, the alter ego of MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI, VARSHA MAHENDER SABHNANI A/K/A VARSHA MURLIDHA SABHNANI AND POOJA SABHNANI, up to and including APRIL 12, 2010, when PLAINTIFF was wrongfully terminated.

6. That Defendant ETERNAL LOVE PARFUMS CORP. f/k/a ETERNAL LOVE PARFUMS II LLC was an employer of Deborah Litras up to and including April 12, 2010, which PLAINTIFF performed work, labor and services for, until Plaintiff was wrongfully terminated.

7. MAHENDER MURLIDHA SABHNANI was an employer of Deborah Litras up to and including April 12, 2010 when Plaintiff was wrongfully terminated. VARSHA MAHENDER SABHNANI A/K/A VARSHNA MURLIDHAR SABHNANI was an employer of Deborah Litras up to and including April 12, 2010 when Plaintiff was wrongfully terminated.

8. That on or about 2007, PLAINTIFF discovered that DEFENDANTS MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI,

VARSHA MAHENDER SABHNANI A/K/A VARSHA MURLIDHA SABHNANI were harboring indentured servants or slaves at their residence/business location.

9. That Plaintiff was compelled to testify against DEFENDANTS MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI AND VARSHA MAHENDER SABHNANI A/K/A VARSHA MURLIDHA SABHNANI in a criminal case in the Federal Court, Eastern District of New York.

10. On 12/17/07, at the end of a seven week trial, a jury convicted Defendants of the following criminal offenses, among others: (a) conspiracy to commit forced labor in violation 18 U.S.C. 371 AND; (B) 2 COUNTS OF FORCED LABOR under 18 U.S.C. 1589 AND 1594(A); © conspiracy to harbor aliens in violation of 8 U.S.C 1324 (a) (1) (a) (1) and 1324 (a) (1) (b) iii ;(D)2 counts of harboring aliens in violation of 8 U.S.C. 1324 (A) (1) (A) iii and 1324 (a) (1) (A) (v) (11) and 1324(a) (1)(B) (iii); (e) conspiracy to commit peonage in violation of U.S.C. 1581 (a) and 371 (F) two counts of peonage in violation of 18 U.S.C 1581 (a) and 1594 (a) (f) and two counts of servitude in violation of 18 U.S.C. 1592 AND 371;

11. On or about APRIL 12, 2010, and without any justifiable reason, PVM INTERNATIONAL CORPORATION terminated the employment of PLAINTIFF, DEBORAH LITRAS.

JURISDICTION AND VENUE

12. Jurisdiction is conferred on the Court by USCA.

13. The Court also has supplemental jurisdiction over PLAINTIFF's State Law claims pursuant to 28 U.S.C section 1367.

14. The Court has venue pursuant to 28 U.S.C. section 1391(b) as all of the events giving rise to this action occurred within this district and DEFENDANTS reside and do business within this district.

THE PARTIES

15. PLAINTIFF, DEBORAH LITRAS, is an adult individual, residing in Nassau County, New York.

16. DEFENDANT, MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI, is an adult individual, currently incarcerated at FCI Colman Low, Federal Correctional Institution, 846 NE 54th Terrace, Colman FL, 33521.

17. DEFENDANT, VARSHA MAHENDER SABHNANI A/K/A VARSHA MURLIDHA SABHNANI, is an adult individual, currently incarcerated at FCI Waseca, Federal Correctional Institution, P.O. Box 1731, Waseca MN, 56093.

18. PVM INTERNATIONAL CORPORATION f/k/a PVM INTERNATIONAL II LLC, upon information and belief, is a corporation doing business in Nassau County, New York, and performs interstate commerce in the State of New York. That Plaintiff, Deborah Litras, was an employee of PVM International and received checks from PVM International.

19. ETERNAL LOVE PARFUMS CORP. f/k/a ETERNAL LOVE PARFUMS II LLC, upon information and belief, is a corporation doing business in Nassau County New York, and performs interstate commerce in the State of New York. That Deborah Litras was an employee of Eternal Love Parfums Corp. and performed work, labor, and services for Defendant Eternal Love Parfums Corp.

20. Sam Israel, the attorney for Defendants, terminated Plaintiff's employment presumably at the direction of his employers PVM INTERNATIONAL CORPORATION f/k/a PVM INTERNATIONAL II LLC, ETERNAL LOVE PARFUMS CORP. f/k/a ETERNAL LOVE PARFUMS II LLC, MAHENDER MURLIDHAR SABHNANI a/k/a MAHENDER MURLIDHA SABHNANI, VARSHA MAHENDER SABHNANI a/k/a VARSHA MURLIDHA SABHNANI.

STATEMENT OF FACTS

21. PLAINTIFF was hired by DEFENDANT in March 2000, as an Export Manager for PVM INTERNATIONAL CORPORATION.

22. PLAINTIFF generally received \$1230.75 dollars weekly (GROSS PAY) from DEFENDANT, PVM INTERNATIONAL, as a salary. Neither PVM, nor DEFENDANTS, MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI, VARSHA MAHENDER SABHNANI A/K/A/ VARSHA MURLIDHA SABHNANI, paid or attempted to pay overtime to PLAINTIFF, DEBORAH LITRAS.

23. THAT On or about 2007, DEFENDANTS, MAHENDER MURLIDHAR SABHNANI A/K/A MAHENDER MURLIDHA SABHNANI, and VARSHA MAHENDER SABHNANI A/K/A/ VARSHA MURLIDHA SABHNANI, were arrested for various crimes, which both DEFENDANTS were convicted of.

24. THAT PLAINTIFF, DEBORAH LITRAS, acted as a dutiful employee, and continued to help run the DEFENDANTS business entirely at the direction of DEFENDANTS or their agents.

25. THAT PLAINTIFF acted as a good and dutiful employee up until the date of termination.

26. THAT termination took place on or about April 2010 when DEFENDANT, or DEFENDANT'S agent, SAM ISRAEL, wrote a letter to PLAINTIFF, terminating her employment.

27. THAT termination took place as a result of the wrongful actions of DEFENDANTS via their attorney SAM ISRAEL and the Defendants wrongfully terminated PLAINTIFF because she TESTIFIED against DEFENDANTS. The Defendants could not and would not terminate the Plaintiff until their appeals were finalized since it would taint AND PREJUDICE DEFENDANT'S appeals and would further cause bad publicity to accrue to DEFENDANTS. Plaintiff was labeled in the press as "Madame America" and prejudice would likely result in the DEFENDANTS criminal case.

AS AND FOR A FIRST CAUSE OF ACTION

VIOLATION OF THE OVERTIME PROVISIONS OF THE FLSA

28. DEFENDANTS intentionally or otherwise in violation of the FLSA failed to pay plaintiffs overtime compensation at rates at one and one half times the regular rates of pay for each hour worked in excess of forty hours in a workweek in violation 29 U.S.C SECTION 207 (a) (1).

29. DEFENDANTS failure to pay PLAINTIFF overtime compensation was willful within the meaning of 29 U.S.C Section 255(a) since DEFENDANT had no regard whatsoever for legal requirements in connection with their wage policies.

30. PLAINTIFF has been damaged in an amount to be determined at trial.

31. An exhibit showing the full extent of the overtime for the three year period prior to my client's termination is attached herein and made a part hereof as Exhibit A. An affidavit with regard to the overtime is attached as EXHIBIT B.

AS AND FOR A SECOND CAUSE OF ACTION
ACCRUED VACATION TIME UNDER LABOR LAW §191(3)

32. PLAINTIFF was an employee under section 651 of the Labor Law since PLAINTIFF was not acting in a bona fide executive, administrative, or professional capacity.

33. DEFENDANT violated Labor Law section 191(3), 198, and 190.

34. That PLAINTIFF was being paid for vacation pay in 2008 when she worked for Defendant.

Upon information and belief, DEFENDANT MAHENDER MURLIDHAR SABHNANI agreed

to pay PLAINTIFF vacation pay in order to induce PLAINTIFF to remain on the job when DEFENDANTS were having their legal troubles as a result of the harboring of slaves.

35. That Defendant and PLAINTIFF had an express or implied contract in which DEFENDANT was to pay for vacation payments upon termination as a result of the customary acts of the employer.

36. That section 198 (c) of the labor law requires that the employer abide by the terms of its agreement to provide benefits.

37. The PLAINTIFF did not make decisions on her own and was obligated to confirm any expenditure with the DEFENDANT MAHENDER MURLIDHAR SABHNANI and did not have the power or authority to hire or fire people or make decisions on her own.

38. That as a result of the breach of its obligation by DEFENDANT, PLAINTIFF was and is entitled to vacation pay and overtime pay and attorney's fees, costs, disbursements, and expenses.

AS AND FOR A THIRD CAUSE OF ACTION
VIOLATION OF THE RETALIATION AND WHISTLE BLOWER LAWS OF THE
U.S.C.A.

39. DEFENDANTS willfully or otherwise in violation of TITLE 42 Section 1985 and the Labor laws of the State of New York retaliated against Plaintiff's testimony at trial by wrongfully terminating PLAINTIFF's employment.

40. On November 28th, 2007, Plaintiff Deborah Litras testified on behalf of the government against Defendant MAHENDER MURLIDHAR SABHNANI and VARSHA MAHENDER SABHNANI. On or about March 25th, 2010, Defendants, Mahender Murlidhar Sabhnani and Varsha were no longer able to appeal their convictions and two weeks later they terminated Plaintiff.

U.S.C.A. TITLE 42, SECTION 1985 provides that “if two or more persons in any state conspire to deterany party or witness in any Court of the United States from attending such court or from testifying to any matter therein **or to injure such party or witness in his person or property on account of his having attended or testified.....the party so injured or deprived may have an action against any one or more of the conspirators.**

41. That Defendants MAHENDER MURLIDHAR SABHNANI and VARSHA MAHENDER SABHNANI , et.al., sought to injure Plaintiff for having testified against them at trial and thus, PLAINTIFF has a cause of action against both conspirators.

PLAINTIFF is thus entitled to a judgment against all co-conspirators for the wrongful termination.

42. PLAINTIFF has been damaged in an amount to be determined at trial.

AS AND FOR A FIFTH CAUSE OF ACTION
NEW YORK STATE WHISTLEBLOWERS ACTION / PROHIBITED AND UNLAWFUL RETALIATION

43. Section 215 of the New York State Labor Law prescribes that no employer shall penalize any employee from making a complaint about any provisions of the labor law, (a) No employer or his or her agent or the officer or agent of any corporation, partnership, or limited liability

company shall discharge, penalize, or in any other manor shall discriminate, or retaliate against any employee...(I) because such employee has made a complaint to his or her employer, or to the commissioner or his /or her authorized representative, that the employer has violated any provision of this chapter, or (ii) because such employee has caused to be instituted a proceeding under or related to this chapter, or (iii) because such employee has provided information to the commissioner or his or her authorized representative, or (iv) because such employee has testified or is about to testify in an investigation or proceeding under this chapter, or (v) because such employee has otherwise exercised rights protected under this chapter, or (vi) because the employer has received an adverse determination from the commissioner involving the employee.

44. PLAINTIFF has testified in a hearing before the Federal Court, Eastern District of New York and as a result PLAINTIFF was terminated.

45. PLAINTIFF thus seeks monies under this provision of the Law together with attorney's fees and interest.

46. It is respectfully requested that PLAINTIFF receive any and all remedies deemed just, necessary and proper.

47. PLAINTIFF has been damaged in an amount to be determined at trial.

WHEREFORE, PLAINTIFF seeks judgment in the above-captioned causes of action, together with such other and further relief deemed just necessary and proper by the Court.

Submitted by:

A handwritten signature in black ink, appearing to be 'D. Gevanter'.

DAVID GEVANTER, ESQ.
Attorney for Plaintiff
16 West Hoffman Avenue
Lindenhurst, N.Y. 11757
(516) 935-9053

DEBORAH LITRAS
OVERTIME HOURS
NOVEMBER 2008 - APRIL 2010

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Nov. 3, 2008	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Tues., Nov. 4, 2008	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Wed., Nov. 5, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 6, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Nov. 7, 2008	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Mon., Nov. 10, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Tues., Nov. 11, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Nov. 12, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 13, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Nov. 14, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Nov. 17, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Nov. 18, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Wed., Nov. 19, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 20, 2008	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Fri., Nov. 21, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Nov. 24, 2008	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Tues., Nov. 25, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Nov. 26, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 27, 2008		Holiday	0
Fri., Nov. 28, 2008		Holiday	0
Mon., Dec. 1, 2008	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Tues., Dec. 2, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 3, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Dec. 4, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Dec. 5, 2008	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Mon., Dec. 8, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 9, 2008	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Wed., Dec. 10, 2008	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Thurs., Dec. 11, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Dec. 12, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Mon., Dec. 15, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Tues., Dec. 16, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 17, 2008	6:45 A.M.	5:45 P.M.	3 Hrs.
Thurs., Dec. 18, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Fri., Dec. 19, 2008	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Mon., Dec. 22, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 23, 2008	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Wed., Dec. 24, 2008	6:45 A.M.	3:00 P.M.	0
Thurs., Dec. 25, 2008		Holiday	0
Fri., Dec. 26, 2008		Holiday	0

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Dec. 29, 2008	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Tues., Dec. 30, 2008	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 31, 2008	6:45 A.M.	4:00 P.M.	1 Hr. / 15 Mins.
Thurs., Jan. 1, 2009		Holiday	0
Fri., Jan. 2, 2009	6:45 A.M.	2:30 P.M.	0
Mon., Jan. 5, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Jan. 6, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Wed., Jan. 7, 2009	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Thurs., Jan. 8, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Jan. 12, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Tues., Jan. 13, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Wed., Jan. 14, 2009	6:45 A.M.	5:15 P.M.	2 Hrs. / 30 Mins.
Thurs., Jan. 15, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 16, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Mon., Jan. 19, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Tues., Jan. 20, 2009	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Wed., Jan. 21, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Jan. 22, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 23, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Mon., Jan. 26, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Tues., Jan. 27, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Wed., Jan. 28, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., Jan. 29, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Fri., Jan. 30, 2009	6:30 A.M.	6:00 P.M.	3 Hrs. / 30 Mins.
Mon., Feb. 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 3, 2009	6:45 A.M.	4:00 P.M.	1 Hr. / 15 Mins.
Wed., Feb. 4, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., Feb. 5, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 6, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Feb. 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 10, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 11, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., Feb. 12, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Feb. 16, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 17, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 18, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., Feb. 19, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 20, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Feb. 23, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 24, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 25, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., Feb. 26, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Fri., Feb. 27, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Mon., March 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., March 3, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 4, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 5, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Fri., March 6, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Mon., March 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., March 10, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 11, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., March 12, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., March 16, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Tues., March 17, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 18, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 19, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 20, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., March 23, 2009	6:00 A.M.	6:00 P.M.	4 Hrs.
Tues., March 24, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 25, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 26, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 27, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Mon., March 30, 2009	6:30 A.M.	6:00 P.M.	3 Hrs. / 30 Mins.
Tues., March 31, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., April 1, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., April 2, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., April 3, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., April 6, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., April 7, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., April 8, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., April 9, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., April 10, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Mon., April 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., April 14, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., April 15, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., April 16, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., April 17, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., April 20, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., April 21, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., April 22, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Thurs., April 23, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., April 24, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., April 27, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., April 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., April 29, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., April 30, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., May 1, 2009	6:45 A.M.	4:30 P.M.	1 Hr. / 45 Mins.
Mon., May 4, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., May 5, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., May 6, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., May 7, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., May 8, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., May 11, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., May 12, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., May 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., May 14, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., May 15, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., May 18, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., May 19, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., May 20, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., May 21, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Fri., May 22, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Mon., May 25, 2009		Holiday	0
Tues., May 26, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., May 27, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Thurs., May 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Fri., May 29, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., June 1, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., June 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., June 3, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., June 4, 2009		Vacation	0
Fri., June 5, 2009		Vacation	0
Mon., June 8, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., June 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., June 10, 2009	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Thurs., June 11, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., June 12, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., June 15, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., June 16, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., June 17, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., June 18, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., June 19, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., June 22, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., June 23, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., June 24, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., June 25, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., June 26, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., June 29, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., June 30, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., July 1, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., July 2, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., July 3, 2009		Holiday	0
Mon., July 6, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., July 7, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., July 8, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., July 9, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., July 10, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Mon., July 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., July 14, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., July 15, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., July 16, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., July 17, 2009	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Mon., July 20, 2009	6:45 A.M.	6:30 P.M.	3 Hrs. / 45 Mins.
Tues., July 21, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., July 22, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., July 23, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., July 24, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., July 27, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., July 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., July 29, 2009	6:45 A.M.	6:15 P.M.	3 Hrs. / 30 Mins.
Thurs., July 30, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., July 31, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Aug. 3, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Aug. 4, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Aug. 5, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Aug. 6, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Aug. 7, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Aug. 10, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Aug. 11, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Aug. 12, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Aug. 13, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Fri., Aug. 14, 2009	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Mon., Aug. 17, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Aug. 18, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Aug. 19, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Aug. 20, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Aug. 21, 2009	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Mon., Aug. 24, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Aug. 25, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Wed., Aug. 26, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Aug. 27, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Aug. 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Aug. 31, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Sept. 1, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Sept. 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Sept. 3, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Fri., Sept. 4, 2009		Vacation	0
Mon., Sept. 7, 2009		Holiday	0
Tues., Sept. 8, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Sept. 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Sept. 10, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Sept. 11, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Sept. 14, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Sept. 15, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Sept. 16, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Sept. 17, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Sept. 18, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Sept. 21, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Sept. 22, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Sept. 23, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Sept. 24, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Sept. 25, 2009	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Mon., Sept. 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Sept. 29, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Sept. 30, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Oct. 1, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Oct. 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Oct. 5, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Oct. 6, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Oct. 7, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Oct. 8, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Oct. 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Oct. 12, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Oct. 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Oct. 14, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Oct. 15, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Oct. 16, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Oct. 19, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Oct. 20, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Oct. 21, 2009		Vacation	0
Thurs., Oct. 22, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Oct. 23, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Oct. 26, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Oct. 27, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Oct. 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Oct. 29, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Oct. 30, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Nov. 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Nov. 3, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Nov. 4, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 5, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Nov. 6, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Nov. 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Nov. 10, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Nov. 11, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 12, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Nov. 13, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Nov. 16, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Nov. 17, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Nov. 18, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Nov. 19, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Nov. 20, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Nov. 23, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Nov. 24, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Wed., Nov. 25, 2009	6:45 A.M.	5:30 P.M.	2 Hrs. / 45 Mins.
Thurs., Nov. 26, 2009		Holiday	0
Fri., Nov. 27, 2009		Holiday	0

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Nov. 30, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 1, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 2, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Dec. 3, 2009		Vacation	0
Fri., Dec. 4, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Dec. 7, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 8, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 9, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Dec. 10, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Dec. 11, 2009	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Mon., Dec. 14, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 15, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 16, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Dec. 17, 2009	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Dec. 18, 2009	5:45 A.M.	6:00 P.M.	4 Hrs. / 15 Mins.
Mon., Dec. 21, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 22, 2009		Vacation	0
Wed., Dec. 23, 2009	6:45 A.M.	2:00 P.M.	0
Thurs., Dec. 24, 2009		Holiday	0
Fri., Dec. 25, 2009		Holiday	0
Mon., Dec. 28, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Dec. 29, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Dec. 30, 2009	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Dec. 31, 2009		Holiday	0
Fri., Jan. 1, 2010		Holiday	0
Mon., Jan. 4, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Jan. 5, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Jan. 6, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Jan. 7, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 8, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Jan. 11, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Jan. 12, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Jan. 13, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Jan. 14, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 15, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Jan. 18, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Jan. 19, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Jan. 20, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Jan. 21, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 22, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., Jan. 25, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Jan. 26, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Jan. 27, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Jan. 28, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Jan. 29, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Feb. 1, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 2, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 3, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Feb. 4, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 5, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Feb. 8, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 9, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 10, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Feb. 11, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 12, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Feb. 15, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 16, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 17, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Feb. 18, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 19, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., Feb. 22, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., Feb. 23, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., Feb. 24, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., Feb. 25, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., Feb. 26, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., March 1, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., March 2, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 3, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 4, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 5, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., March 8, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., March 9, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 10, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 11, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 12, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., March 15, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., March 16, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 17, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 18, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 19, 2010		Vacation	0

<u>DATE</u>	<u>WORK START TIME</u>	<u>WORK END TIME</u>	<u># OF OVERTIME HOURS</u>
Mon., March 22, 2010		Vacation	0
Tues., March 23, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 24, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., March 25, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., March 26, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., March 29, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., March 30, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., March 31, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., April 1, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., April 2, 2010	6:45 A.M.	4:00 P.M.	1 Hr. / 15 Mins.
Mon., April 5, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., April 6, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Wed., April 7, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Thurs., April 8, 2010	6:45 A.M.	5:45 P.M.	3 Hrs.
Fri., April 9, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Mon., April 12, 2010	6:45 A.M.	6:00 P.M.	3 Hrs. / 15 Mins.
Tues., April 13, 2010	6:45 A.M.	5:00 P.M.	2 Hrs. / 15 Mins.
Wed., April 14, 2010		Bereavement	0
Thurs., April 15, 2010		Bereavement	0
Fri., April 16, 2010		Bereavement	0

UNITED STATES DISTRICT COURT
EASTERN DISTRICT

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DEBORAH LITRAS,

PLAINTIFF,

-AGAINST -

Affidavit of Merits
Case No. 11-cv-5695

PVM INTERNATIONAL CORPORATION f/k/a
PVM INTERNATIONAL II LLC,
POOJA SABHNANI, ETERNAL LOVE PARFUMS CORP. F/K/A
ETERNAL LOVE PARFUMS II LLC,
MAHENDER MURLIDHAR SABHNANI A/K/A
MAHENDER MURLIDHA SABHNANI,
VARSHA MAHENDER SABHNANI A/K/A VARSHA
MURLIDHA SABHNANI, "JOHN DOE AND JANE DOE"

DEFENDANTS.

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DEBORAH LITRAS, being duly sworn, deposes and says:

1. I make the following statements under penalties of perjury.
2. I worked for PVM International Corp. and Eternal Love Parfums Corp. for approximately ten years at a salary of \$1,230.75 dollars per week.
3. I worked as an "export manager" at PVM International Corp. and Eternal Love Parfums Corp.

My tasks included making phone calls, frequently to people overseas, contacting whomever my employer, Mr. Mahender Murlidhar Sabhnani asked me to contact.

4. I lacked any decision-making authority and was not given the power to hire or fire employees. I did not determine who the vendors of the corporation were and any money expended on behalf of the corporations had to be approved by Mr. Mahender Murlidhar Sabhnani. I had no authority to determine or change prices on invoices.

5. I worked regularly Monday-Friday from 6:45am until 5:45pm until April 2010, when I was terminated.

6. While employed at PVM International Corp., I was forced to work twelve hours a day, without being paid at the overtime rate. I was specially forced to do this as a result of my employer, Mr. Mahender Murlidhar Sabhnani's, difficulty with the criminal charges he was facing since I was the primary person who was compelled to do extra work as a result of my employer's legal problems. After DEFENDANT, MAHENDER MURLIDHAR SABHNANI, was arrested, the employers', PVM International Corp. and Eternal Love Parfums Corp. Office and home was considered to be a crime scene by the authorities, and I was thus forced to work from home. I used my personal equipment and resources to keep the business running. I worked whenever I was told to and I even had my pay docked if I went to a funeral or a wedding.

7. That I respectfully request the overtime payments I am due beginning from November 2005 until my date of termination in April 2010. I also respectfully request that I receive my vacation

pay since my employer had previously provided me with vacation pay and we had a written or implied contract where he intended to continue to provide me with these benefits.

8. Upon information and belief, when Mr. Mahender Murlidhar Sabhnani and PVM International Corp., and Eternal Love Parfums Corp., exhausted all of his appeals, he fired me, by having Samuel P. Israel terminate me by letter. Other than the retaliation, the Defendants had no other basis to fire me. The Defendant SABHNANI, via SAM ISRAEL claimed that I was being let go as a result of “financial considerations”. No one other than the undersigned was fired from the job.

9. Once employed, I was guaranteed a pension, but have not been made aware of any of the details or its existence. However, letters were sent to Defendant’s attorney Sam P. Israel, but upon information and belief, he failed to make a reply. Defendant also failed to indicate what happened to my pension and whether it still exists.

10. A duty of care to me was breached as a result of Defendant’s harboring slaves. As a result, I suffered severe emotional distress which has caused my bout with breast cancer to be exacerbated.

11. I knew people lived and worked at the corporation site, but did not know they were slaves until 2007, shortly before authorities were contacted.

12. The Motion to dismiss made by Defendants’ counsel is frivolous and without merit. I ask that

it be dismissed in its entirety.

WHEREFORE it is respectfully requested that the complaint not be dismissed, that PLAINTIFF be given her full and fair day in court, together with such other and further relief deemed just, necessary, and proper by the court.

Dated: JUNE 2nd, 2012

X  _____
Deborah Litras

